



LAW OFFICES
LIMITED LIABILITY PARTNERSHIP

LOS ANGELES, CA
SAN FRANCISCO, CA
WILMINGTON, DE
NEW YORK, NY

10100 SANTA MONICA BLVD.
13th FLOOR
LOS ANGELES
CALIFORNIA 90067

TELEPHONE: 310/277 6910

FACSIMILE: 310/201 0760

Jeffrey P. Nolan

January 19, 2021

jnolan@pszjlaw.com

The Honorable Alan S. Trust
United States Bankruptcy Court
Eastern District of New York
Alfonse M. D'Amato Federal Courthouse
290 Federal Plaza
Central Islip, New York 11722

Re: **In re: Orion HealthCorp, Inc., et al.**
Howard M. Ehrenberg v. Howard M. Schoor
Adv. Proc. No. 20-08042-AST

Dear Judge Trust:

On October 9, 2020, Plaintiff issued a letter request for a pre-motion conference as part of the Trustee's request for permission to file a motion for summary judgment.

At the case management hearing held in this adversary on November 21, 2020, the Court directed the parties to submit a joint statement of facts in preparation for the Case Management Conference.

Counsel for Plaintiff and Defendant met in good faith and submit the following Joint Statement of Stipulated Facts outlining the basic fact pattern.

Very truly yours,

/s/ Jeffrey P. Nolan

Jeffrey P. Nolan

JPN:rlm

cc: Donald F. Campbell, Jr., Esq. (Via ECF)
(Counsel for Defendant, Howard M. Schoor)

NEW YORK
780 THIRD AVENUE
36th FLOOR
NEW YORK
NEW YORK 10017-2024
TELEPHONE: 212/561 7700
FACSIMILE: 212/561 7777